

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

TEMUJIN KENSU #189355,
f/k/a FREDERICK FREEMAN,

Plaintiff,

v.

BORGERDING, M.D., et al

Defendants,

Case No: 4:16-cv-13505

District Judge: Linda V. Parker

Magistrate Judge: Stephanie Dawkins Davis

EXCOLO LAW, PLLC
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CHAPMAN LAW GROUP
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**DEFENDANTS ROBERT LACY, D.O. AND JEFFREY BOMBER, D.O.'S
EXPERT DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(2)(A)**

NOW COME Defendants ROBERT LACY, D.O., AND JEFFREY BOMBER, D.O.

by and through their attorneys, CHAPMAN LAW GROUP, and for their Expert

Disclosures Pursuant to Fed. R. Civ. P. 26(a)(2)(A), state as follows:

RETAINED EXPERT WITNESSES

- 1. Arnold J. Feltoon, M.D., F.A.A.E.M., C.C.H.P. (Retained Expert – Correctional Medicine)**

c/o Chapman Law Group

See attached Expert Report.

- 2. Paul J. Drouillard, D.O., F.A.O.A.O. (Retained Expert – Orthopedic Surgeon)**

c/o Chapman Law Group

See attached Expert Report.

NON-RETAINED EXPERTS

- 3. Defendant Robert Lacy, D.O.**

c/o Chapman Law Group

Dr. Lacy will testify regarding his involvement in Mr. Kensu's medical care, as reflected in Mr. Kensu's MDOC medical records. He will offer expert testimony pursuant to Fed. R. Evid. 702, 703, and/or 705 regarding his examination, assessment, and treatment of Mr. Kensu, as well as regarding information that Mr. Kensu reported to him for purposes of medical treatment and regarding Mr. Kensu's medical records, including facts and opinions set forth therein.

- 4. Defendant Jeffery Bomber, D.O.**

c/o Chapman Law Group

Dr. Bomber will testify regarding his involvement in Mr. Kensu's medical care, as reflected in Mr. Kensu's MDOC medical records. He will offer expert testimony pursuant to Fed. R. Evid. 702, 703, and/or 705 regarding his examination, assessment, and treatment of Mr. Kensu, as well as regarding information that Mr. Kensu reported to him for purposes of medical treatment and regarding Mr. Kensu's medical records, including facts and opinions set forth therein.

- 5. Any expert identified by any other party, whether or not that party calls the expert to testify.**
- 6. Any medical treater identified in any of Mr. Kensu's medical records (including but not limited to MDOC medical records).**

These non-retained witnesses will offer expert testimony pursuant to Fed. R. Evid. 702, 703, and/or 705, including but not limited to information regarding their personal involvement in Mr. Kensu's medical care, including the opinions they formed at the time of their involvement. They also will testify regarding Mr. Kensu's medical records that are related to their involvement, including facts and opinions set forth therein.

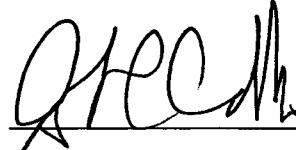
- 7. Any medical treater identified in depositions, identified in written discovery, and/or otherwise identified during the course of discovery.**

These non-retained witnesses will offer expert testimony pursuant to Fed. R. Evid. 702, 703, and/or 705, including but not limited to information regarding their personal involvement in Mr. Kensu's medical care, including the opinions they formed at the time of their involvement. They also will testify regarding Mr. Kensu's medical records that are related to their involvement, including facts and opinions set forth therein.

- 8. Any and all necessary rebuttal witnesses.**

Respectfully submitted,

CHAPMAN LAW GROUP



Dated: May 1, 2018

Ronald W. Chapman, (P37603)

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PROOF OF SERVICE

I certify that DEFENDANTS ROBERT LACY, D.O. AND
JEFFREY BOMBER, D.O.'s EXPERT DISCLOSURES
PURSUANT TO FED R. CIV. P 26(A)(2)(A) was served upon
all attorneys of record on this ____ day of May, 2018, by
means of:

☒ U.S. Mail ☐ Hand Delivery
☐ Facsimile ☐ _____

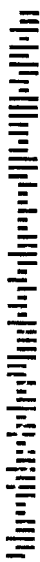


EMMA BARKO

CHAPMAN
LAW GROUP

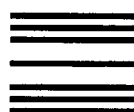
25 YEARS
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